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**THE GOODYEAR TIRE & RUBBER COMPANY’S UNOPPOSED MOTION TO  
MODIFY THE COURT’S INITIAL PROGRESSION ORDER**

5. Not long after this case was transferred from the United States District Court for the Eastern District of Pennsylvania (after having been removed from the Court of Common Pleas), this Court entered its Initial Progression Order. (ECF No. 56.)

6. In this Order, the Court set August 8, 2018, as the deadline to add additional parties to this litigation.

7. Goodyear respectfully requests that the Court extend this deadline by 60 days to allow it additional time to complete its investigation into whether third party claims against Mr. Blair, the vehicle's driver, or Dandee Construction, Mr. Blair's employer and owner of the truck, are appropriate.

8. Goodyear is in the process of subpoenaing Mr. Blair's medical records, Mr. Blair's employment records, and other records related to Dandee Construction's care, monitoring, repair, and maintenance to the Silverado and its tires, and will be in a position to decide whether to seek to add additional defendants in the next 60 days.

9. Goodyear has conferred with Plaintiffs' counsel and has been authorized to designate this Motion as unopposed.

**WHEREFORE,** Goodyear respectfully requests that the Court extend the deadline to add additional parties 60 days from the currently-set deadline of August 8, 2018, and for such other and further relief as the Court deems just and appropriate under the circumstances.

THE GOODYEAR TIRE & RUBBER  
COMPANY, Defendant

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### **CERTIFICATE OF SERVICE**

I hereby certify that on August 6, 2018, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send notification of such filing to the following:

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